

RESPONSE UNDER 37 C.F.R. § 1.116
U.S. Application No. 10/760,671

REMARKS

Claims 1-50 are all the claims pending in the application. None of the claims is being amended.

Rejections Under 35 U.S.C. 103(a) – Claims 1-3, 16-20, 44 and 50

The Examiner has rejected claims 1-3, 16-20, 44 and 50 under 35 U.S.C. 103(a) as being allegedly unpatentable over Deutscher et al. (U.S. patent publication No. 2004/0001106A1). Applicants respectfully traverse this rejection in view of the following arguments.

Specifically, independent claim 1 recites a media presentation environment representation having portion of the media presentation environment representation defined as multiple hot-spots, each of the hot-spots being associated with a particular media presentation device. The applied reference, Deutscher et al. does not teach at least several features of this claim. First of all, this reference does not teach the media presentation environment representation itself. This term is apparently misinterpreted by the Examiner. In this regard, Applicants respectfully submit that the plain meaning of the words “media presentation environment representation” is representation of the environment where the presentation takes place. This plain meaning of the term media presentation environment representation is supported by disclosure and multiple examples appearing at Figure 3 and Figure 4 and paragraph [0067] et seq. of the instant application.

Specifically, according to the specification of the instant application, the media presentation environment representation clearly means visual representation of the environment (such as conference room), where the media presentation is actually presented or to be presented,

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see, for example, Figure 3 and Figure 4 and paragraph [0067] et seq. For example, Figure 3 illustrates visual representation of a conference room having two conference tables as well as multiple media presentation devices. This figure illustrates one specific example of the claimed media presentation environment representation. Moreover, paragraphs [0067] et seq. of the specification specifically use the claimed term media presentation environment representation and specifically describe this term and illustrate it with various examples. Thus, in light of the plain meaning of the words of the claim term as well as the identified ample disclosure in figures and referenced portions of the specification, one of ordinary skill in the art, after reading the specification of the present application, would have no confusion as to the meaning of the term media presentation environment representation. As recited in claim 1, this visual representation of the media presentation environment is incorporated within the media presentation authoring system.

On the other hand, Deutscher et al. does not disclose anything even similar to the claimed media presentation environment representation. Specifically, Deutscher et al. does not teach or suggest a media authoring system having visual representation of the environment where the media presentation is do be presented. The Examiner appears to admit this fact at page 4, first paragraph of the Office Action. In the Office Action, the Examiner simply states that “Deutscher teaches a presentation production system, which contains a presentation tool window.” Examiner never mentions this limitation and does not even indicate where this limitation is disclosed in the prior art. In fact, the Office Action is entirely devoid of any indication as to the Examiner’s interpretation of the meaning of the above-referenced claim term.

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Moreover, given the patent lack of teaching or suggestion of the aforesaid feature in the cited prior art, the Examiner also fails to explain why a person of ordinary skill in the art would be motivated to include the media presentation environment representation into the presentation production system of Deutscher et al. Deutscher et al. is entirely devoid of any suggestions to incorporate the media presentation environment representation into the presentation production environment. For all the foregoing reasons, the prior art of record fails to teach or suggest the claimed media presentation environment representation and claim 1 is patentable over Deutscher et al.

Furthermore, Deutscher et al. never teaches or suggests the claimed portion of the media presentation environment representation, which is defined as multiple hot-spots, each of the hot-spots being associated with a particular media presentation device. While Deutscher et al. discloses various peripheral devices, those output devices are described purely as part of general purpose computer system 110 shown in Figure 1 of Deutscher et al., see also paragraphs [0072] and [0076]. Deutscher et al. never discloses how those output devices are integrated with the media presentation authoring system and how they are represented in such system.

Because Deutscher et al. never teaches integrating various output devices within the presentation authoring system, a person of skill in the art would not have any motivation to associate icons with those output devices and include those icons within the media presentation environment representation. In other words, the output devices included in the general purpose computer system 110 shown in Figure 1 of Deutscher et al. are not part of the media presentation authoring system described in that reference and are not represented therein. Therefore,

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Deutscher et al. fails to teach or suggest the claimed portion of the media presentation environment representation, which is defined as multiple hot-spots, each of the hot-spots being associated with a particular media presentation device. Thus, claim 1 is patentable over Deutscher et al. for this additional reason as well.

If the Examiner continues to insist that the aforesaid limitations of claim 1 are taught in Deutscher et al., Applicants respectfully request the Examiner to point to the specific language of that Deutscher et al. containing the alleged teaching. When the Examiner asserts that there is an explicit or implicit teaching or suggestion in the prior art, the Examiner must indicate where such teaching or suggestion appears in the reference. See *In re Rijckaert*, 28 U.S.P.Q.2d 1955,7 (Fed. Cir. 1993). In the Office Action, the Examiner has failed to do that.

Claim 16 recites the media presentation environment representation and also recites selecting a physical device by selecting a portion of the media presentation environment representation defined as one of multiple hot-spots associated with the physical device. Because the media presentation environment representation itself as well as the aforesaid portion of the media presentation environment representation defined as multiple hot-spots, each being associated with a physical device are not taught or suggested by Deutscher et al., claim 16 is likewise patentable over Deutscher et al.

With respect to the rejection of dependent claims 2-3, 17-20, 44 and 50, while continuing to traverse the Examiner's characterization of the teachings of Deutscher et al. used by the Examiner in rejecting these claims, Applicants respectfully submit that all these claims are

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patentable by definition, by virtue of their dependence upon the patentable independent claims 1 and 16.

Rejections Under 35 U.S.C. 103 – Claims 4-15, 39-42 and 45-48

Claims 4-15, 39-42 and 45-48 stand rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Deutscher et al. (U.S. patent publication No. 2004/0001106A1) in view of Land et al. (U.S. patent publication No. 2004/0039934). Applicants respectfully traverse this rejection in view of the following arguments.

Specifically, independent claims 4 and 9 generally recite, among other limitations, (a) a media presentation environment representation portion, (b) including a portion defined as multiple hot-spots each corresponding to specific media presentation device. For reasons explained in detail with respect to claim 1, these two features of the invention are not taught or suggested in Deutscher et al. The other reference cited by the Examiner, Land et al., fails to remedy the above described deficiency of Deutscher et al. Therefore, independent claims 4 and 9 are not unpatentable over Deutscher et al., Land et al. or any combination thereof.

With respect to the rejection of dependent claims 5-8, 10-15, 39-42 and 45-48, while continuing to traverse the Examiner's characterization of the teachings of Deutscher et al. and Land et al. used by the Examiner in rejecting these claims, Applicants respectfully submit that all these claims are patentable by definition, by virtue of their dependence upon the patentable independent claims 1, 4, 9, 16 and 36 (discussed in detail below).

Rejections Under 35 U.S.C. 103(a) – Claims 21-38 and 49

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Claims 21-38 and 49 under U.S.C. 103(a) stand rejected as being allegedly unpatentable over Deutscher et al. (U.S. patent publication No. 2004/0001106A1) in view of Robotham et al. (U.S. patent No. 6,160,907). Applicants respectfully traverse this rejection in view of the following arguments.

First, with respect to independent claim 36, Applicants respectfully note that neither Deutscher et al., nor Robotham et al., nor any combination thereof teach or suggest the claimed camera system that captures live video of physical devices in a presentation environment. In Response to Arguments portion of the Office Action, the Examiner simply states that Deutscher et al. teaches a camera, which can be included as an input device. Applicants are baffled by the Examiner's response. It appears that the Examiner misinterprets the aforesaid claim limitation. The term clearly means that the claimed camera takes live video of physical devices (such as lights, monitors, etc.) located within the environment (such as conference room) where the presentation is presented. Such a camera, which takes live video of physical devices is described nowhere in Deutscher et al. or any other references cited by the Examiner. Nowhere does Deutscher et al., teach or suggest at least two elements specifically recited by that claim: 1) that the aforesaid camera is operable to capture live video; and 2) that the camera captures live video of physical devices, which are part of the presentation environment. Deutscher et al. never specifies that the camera takes live video of physical devices. The Examiner may not simply assume that the prior art operates exactly as the claimed invention, without the appropriate teaching being present therein. The other reference cited by the Examiner, Robotham et al., also

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fails to remedy the above deficiency of Deutscher et al. Therefore, claim 36 is patentable over Deutscher et al., Robotham et al. or any combination thereof.

With respect to amended independent claims 28 and 32, Applicants respectfully submit that these claims are patentable for at least the same reasons as claims 1, 4 and 9. Specifically, the independent claims 28 and 32 generally recite (a) a media presentation environment representation portion (b) which includes a portion defined as multiple hot-spots each corresponding to specific media presentation device. For reasons explained in detail with respect to claim 1, these features of the invention is not taught or suggested in Deutscher et al. The other reference cited by the Examiner, Robotham et al., fails to remedy the above deficiency of Deutscher et al. Therefore, the amended independent claims 28 and 32 are not unpatentable over Deutscher et al., Robotham et al., or any combination thereof.

With respect to the rejection of dependent claims 21-38 and 49, while continuing to traverse the Examiner's characterization of the teachings of Deutscher et al. and Robotham et al., used by the Examiner in rejecting these claims, Applicants respectfully submit that all these claims are patentable by definition, by virtue of their dependence upon the patentable independent claims 16, 28, 32 and 36.

Rejections Under 35 U.S.C. 103 – Claim 43

Claim 43 stands rejected under 35 U.S.C. 103 as being allegedly unpatentable over Deutscher et al. (U.S. patent publication No. 2004/0001106A1) in view of Robotham et al. (U.S. patent No. 6,160,907) and further in view of Land et al. (U.S. patent publication No.

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2004/0039934). Applicants respectfully traverse this rejection in view of the following arguments.

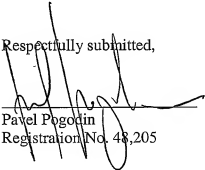
Specifically, with respect to the rejection of the dependent claim 43, while continuing to traverse the Examiner's characterization of the teachings of the references used by the Examiner in rejecting this claim, Applicants respectfully submit that this claim is patentable by definition, by virtue of its dependence upon the patentable independent claim 36.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

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23493

CUSTOMER NUMBER

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